



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 23, 2011

DARRELL CRATE, TREASURER
ROMNEY FOR PRESIDENT, INC.
585 COMMERCIAL ST.
BOSTON, MA 02109

Response Due Date
01/27/2012

IDENTIFICATION NUMBER: C00431171

REFERENCE: JULY QUARTERLY REPORT (04/01/2011 - 06/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 7 item(s):

1. The totals listed on Lines 17(a)(iii), 17(d), 17(e), 20(a), 20(d), 21, 22, 23, 28(a), 28(c), 28(d), 29 and 30, Column B of the Detailed Summary Page appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the election cycle-to-date totals (11/5/08 through 11/6/12). (2 U.S.C. § 434(b) and 11 CFR § 104.3)
2. Schedule A-P of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,500 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. § 441a(a) and (f); 11 CFR § 110.1(b), (e) and (k))

ROMNEY FOR PRESIDENT, INC.

Page 2 of 6

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts

ROMNEY FOR PRESIDENT, INC.

Page 3 of 6

outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

The Commission notes your reattribution of some of these contributions. Please be reminded that all refunds, redesignations, and reattributions must be made within 60 days of receipt of the contribution. To date, one or more of the apparent excessive contributions have not been refunded, redesignated, or reattributed within the 60-day time frame. These contributions must be refunded immediately.

Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 28(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A-P of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

3. Schedule A-P of your report (see attached) discloses a contribution from an individual(s) who has a mailing address outside of the United States of America. Please be advised that 2 U.S.C. §441e(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action

ROMNEY FOR PRESIDENT, INC.

Page 4 of 6

immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B-P supporting Line 28(a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

4. Schedule A-P of your report discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission (see attached). In order for your committee to accept contributions from unregistered organizations, your committee should take steps to ensure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: (1) establish a separate account which contains only those funds permitted under the Act, or (2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

Please inform the Commission of your corrective action immediately and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B-P supporting Line 28(b) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

5. On Schedule B-P supporting Line 23 of your report, you have itemized disbursements for which you have failed to include the address. Please amend

ROMNEY FOR PRESIDENT, INC.

Page 5 of 6

your report to include the missing information. (11 CFR § 104.3(b)(4))

6. Schedule B-P supporting Line 23 discloses disbursements to "Petty Cash" for "Petty Cash." Please be advised that cash disbursements to any person or vendor for any single purchase or transaction may not exceed \$100. If payments to the original vendor exceed \$200 in an election cycle, a memo entry including the name of the original vendor as well as address, date, amount, and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (2 U.S.C. § 432(h)(2) and 11 CFR § 102.11)

7. Schedule B-P of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the campaign related payments to any one vendor by the campaign/staff aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount, and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1154.

ROMNEY FOR PRESIDENT, INC.

Page 6 of 6

Sincerely,

A handwritten signature in black ink that reads "Jill Sugarman". The signature is written in a cursive, flowing style.

Jill Sugarman
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

476

Excessive and/or Prohibited Contributions
Romney for President, Inc. (C00431171)

Contributor Name	Date	Amount	Election
AMES, JOHN MR.	6/22/11	\$2,500.00	P2012
AMES, JOHN MR.	6/27/11	\$50.00	P2012
ARRIGONI, EDWARD MR.	5/2/11	\$200.00	P2012
ARRIGONI, EDWARD MR.	5/20/11	\$2,500.00	P2012
BACON, BLANCHE R. MRS.	4/29/11	\$50.00	P2012
BACON, BLANCHE R. MRS.	5/2/11	\$2,500.00	P2012
BACON, BLANCHE R. MRS.	5/24/11	\$2,500.00	P2012
BACON, BLANCHE R. MRS.	7/14/11	(\$2,500.00)	P2012
CARR, DAYTON T. MR.	6/15/11	\$200.00	P2012
CARR, DAYTON T. MR.	6/29/11	\$2,500.00	P2012
DAVENPORT, JOSEPH MR. III	6/30/11	\$5,000.00	P2012
DAVENPORT, JOSEPH MR. III	8/30/11	(\$2,500.00)	P2012
<i>The above contribution was reattributed more than 60 days from the date of receipt.</i>			
FARLEY, TIM P. MR.	4/23/11	\$100.00	P2012
FARLEY, TIM P. MR.	5/16/11	\$2,500.00	P2012
LANDGARTEN, RICHARD MR.	6/20/11	\$2,500.00	P2012
LUNDGARTEN, RICHARD MR.	5/16/11	\$2,500.00	P2012
MARINATOS, ANTHONY MR.	6/1/11	\$1,000.00	P2012
MARINATOS, TONY MR.	4/19/11	\$2,500.00	P2012
MCMANUS HIGGINS, MICHELE MS.	5/14/11	\$25.00	P2012
MCMANUS HIGGINS, MICHELE MS.	5/16/11	\$2,500.00	P2012
MERRIFIELD, JOHN E. MR. SR.	5/16/11	\$50.00	P2012
MERRIFIELD, JOHN E. MR. SR.	5/16/11	\$2,500.00	P2012
QUINITON, WAYNE MR.	5/12/11	\$2,500.00	P2012
QUINTON, WAYNE E. MR.	4/12/11	\$2,500.00	P2012
READ, KEITH R. MR.	5/16/11	\$2,550.00	P2012
READ, KEITH R. MR.	5/16/11	\$5,000.00	P2012
READ, KEITH R. MR.	5/29/11	(\$2,450.00)	P2012
RINGER, MONT DR.	5/16/11	\$100.00	P2012

Excessive and/or Prohibited Contributions
Romney for President, Inc. (C00431171)

Contributor Name	Date	Amount	Election
RINGER, MONT DR.	6/14/11	\$2,500.00	P2012
SAGRERA, RICARDO A. MR.	6/14/11	\$150.00	P2012
SAGRERA, RICARDO A. MR.	6/28/11	\$2,500.00	P2012
SMITH, BILL S. MR.	6/17/11	\$2,500.00	P2012
SMITH, WILLIAM S. MR.	6/17/11	\$2,500.00	P2012
STILLWELL, RICHARD NEWCOMB MR.	6/30/11	\$5,000.00	P2012
JAYNE, WALKER	5/16/11	\$500.00	P2012
WALKER, JAYNE MRS.	6/21/11	\$2,500.00	P2012
WILSON, JOANNE G. MRS.	5/13/11	\$100.00	P2012
WILSON, JOANNE G. MRS.	5/24/11	\$2,500.00	P2012
WILSON, JOANNE G. MRS.	6/20/11	\$100.00	P2012
YAREMCHUK, MARILYNN MRS.	5/31/11	\$2,500.00	P2012
YAREMCHUK, MARILYNN MRS.	6/20/11	\$100.00	P2012
<i>The following committees appear to be from foreign nationals:</i>			
BLOOM, JONATHAN MR.	6/30/11	\$2,500.00	P2012
BLOOM, STEPHANIE MRS.	6/30/11	\$2,500.00	P2012
BROWN, LOWELL C. MR.	6/15/11	\$2,500.00	P2012
CHRISTOFFERSON, PARIS MRS.	6/28/11	\$2,500.00	P2012
COLLINS, SCOTT MR.	5/16/11	\$2,500.00	P2012
CONNOR, WILLIAM E. MR.	5/9/11	\$1,000.00	P2012
DAILEY, PETER H. MR. JR.	6/28/11	\$2,500.00	P2012
DREW, MARISA MS.	6/21/11	\$2,500.00	P2012
GOETZ, MICHAEL S. MR.	6/30/11	\$2,500.00	P2012

Excessive and/or Prohibited Contributions
Romney for President, Inc. (C00431171)

Contributor Name	Date	Amount	Election
GOVER, J. LITTLETON MR. III	5/11/11	\$2,500.00	P2012
GRANT, THOMAS D. MR.	6/28/11	\$2,500.00	P2012
GREEN, SENAH E. MS.	6/30/11	\$2,500.00	P2012
GRIFFITH, READE E. MR.	6/17/11	\$2,500.00	P2012
KALARIS, KAREN W. MRS.	6/30/11	\$2,500.00	P2012
MANSFIELD, GEOFFREY J. MR.	6/1/11	\$500.00	P2012
MORRISSEY, RICHARD C. MR.	5/2/11	\$1,000.00	P2012
MORRISSEY, RICHARD C. MR.	6/28/11	\$1,500.00	P2012
NICHOLS, STEVEN S. MR.	5/5/11	\$500.00	P2012
NOVAK, DAVID A. MR.	6/30/11	\$2,500.00	P2012
OSMAN, LORRIE SECREST MS.	6/28/11	\$2,500.00	P2012
PETERSON, HOLLY MRS.	6/30/11	\$2,500.00	P2012
POLER, DWIGHT MR.	6/29/11	\$2,500.00	P2012
REILLY, DAVID MR.	6/30/11	\$2,500.00	P2012
ROCKWELL, DAVID B. MR.	5/9/11	\$2,500.00	P2012
SHANER, SIMON N. MR.	6/28/11	\$500.00	P2012
SMITH, MICHAEL B. MR.	6/28/11	\$2,500.00	P2012
SUN, LELAND MR.	5/5/11	\$500.00	P2012

Excessive and/or Prohibited Contributions
Romney for President, Inc. (C00431171)

Contributor Name	Date	Amount	Election
TOLER, LORIANNE MRS.	6/29/11	\$2,500.00	P2012
TOLER, T. LANCE MR.	6/29/11	\$2,500.00	P2012
WHEELER, DAVID P. MR.	6/29/11	\$1,000.00	P2012
YOSHIDA, CHRISTOPHER MR.	6/21/11	\$2,500.00	P2012
DELUCA, PIERRE	4/28/11	\$250.00	P2012
DELUCA, PIERRE	6/27/11	\$250.00	P2012
EDWARDS, BRYANT MR.	6/20/11	\$2,500.00	P2012
KALB, MICHAEL H. MR.	5/23/11	\$2,500.00	P2012
<i>The following committees are not registered with the Federal Election Commission:</i>			
COMMITTEE TO ELECT ALLAN KITTLEMAN	6/30/11	\$750.00	P2012
JOHNSON FOR STATE SENATE	6/30/11	\$1,000.00	P2012
KAREN BROWN FOR MAYOR	6/30/11	\$1,000.00	P2012
MCGEACHIN FOR STATE REPRESENTATIVE	6/27/11	\$250.00	P2012
SUSAN WILLIAMS GIFFORD COMMITTEE	6/30/11	\$100.00	P2012
THE JONES COMMITTEE	6/6/11	\$250.00	P2012
THE ROGENESS COMMITTEE	6/30/11	\$500.00	P2012